



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

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NOV 16 2009

Ref: EPR-N

Mary H. Peterson, Forest Supervisor
2468 Jackson Street
Laramie, Wyoming 82701

Re: Thunder Basin National Grassland
Prairie Dog Management Strategy
and Land and Resource Management
Plan Amendment # 3 Final EIS
CEQ # 20090351

Dear Ms. Peterson:

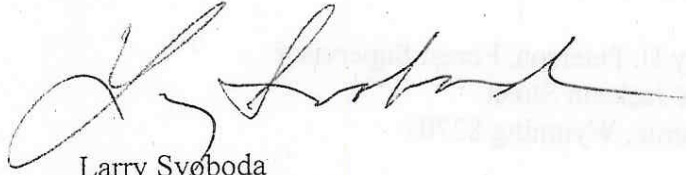
The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Final Environmental Impact Statement (FEIS) for the Thunder Basin National Grassland Prairie Dog Management Strategy and Land and Resource Management Plan Amendment # 3, in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4231 and Section 309 of the Clean Air Act.

EPA notes that two additional alternatives were included in the FEIS in order to expand the range of alternatives, and is pleased that the Environmentally Preferred Alternative 4 has been added to limit lethal control methods. Although rodenticide use is still a potential management method, Alternative 4 focuses on prescribed burning, translocation and land exchanges. The implementation of alternative livestock grazing strategies to create higher vegetation and ultimately a visual barrier to prevent prairie dog colonization has proven to be an effective, non-lethal deterrent, and is also included in this alternative.

EPA acknowledges that the Forest Service has consulted, although informally, with the U.S. Fish and Wildlife Service (USFWS) on the proposed action, and is considering the development of a formal agreement with the USFWS. It is encouraging that the Forest Service may enter into a Candidate Conservation Agreement in the hopes that management strategies protective of the blacktailed prairie dog and associated species will be incorporated and tracked to assist with future adaptive management decisions, with the assumption that the associated species will include the black-footed ferret. EPA continues to have some remaining concerns regarding the future habitat of the to-be-reestablished black-footed ferrets, and is supportive of implementing similar management tools in coordination with the USFWS to ensure that increased prairie dog mortality and habitat impacts do not limit the potential for the black-footed ferrets reintroduction.

We appreciate the opportunity to participate in the review of this project during the NEPA process. If you have any questions regarding EPA's input, please contact me at 303-312-6004, or Melanie Wasco of my staff at 303-312-6540. Thank you for your consideration.

Sincerely,



Larry Svoboda
Director, NEPA Program
Ecosystems Protection and Remediation